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Superior Court of California
County of Los Angeles
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David W. Slayton, Executive Officer / Clerk of Court
By: A. Rosas Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

P.F., et al. (K.G.M.) v. Meta Platforms, Inc., et al., Case No. 23SMCV03371

Judge: Hon. Carolyn B. Kuhl
Dept.: SSC-12

FINAL JURY INSTRUCTIONS

CACI 5000

Members of the jury, you have now heard all the evidence. It is my duty to instruct you on the law that applies to this case. You must follow these instructions as well as those that I previously gave you.

You will have a copy of my instructions with you when you go to the jury room to deliberate. I have provided each of you with your own copy of the instructions.

You must decide what the facts are. You must consider all the evidence and then decide what you think happened. You must decide the facts based on the evidence admitted in this trial.

Do not allow anything that happens outside this courtroom to affect your decision. Do not talk about this case or the people involved in it with anyone, including family and persons living in your household, friends and coworkers, spiritual leaders, advisors, or therapists. Do not do any research on your own or as a group. Do not use dictionaries or other reference materials.

These prohibitions on communications and research extend to all forms of electronic communications. Do not use any electronic devices or media, such as a cell phone or smart phone, PDA, computer, tablet device, the Internet, any Internet service, any text or instant-messaging service, any Internet chat room, blog, or website, including social networking websites or online diaries, to send or receive any information to or from anyone about this case or your experience as a juror until after you have been discharged from your jury duty.

Do not investigate the case or conduct any experiments. Do not contact anyone to assist you, such as a family accountant, doctor, or lawyer. All jurors must see or hear the same evidence at the same time. Do not read, listen to, or watch any news accounts of this trial. You must not let bias, sympathy, prejudice, or public opinion influence your decision.

If you violate any of these prohibitions on communications and research, including prohibitions on electronic communications and research, you may be held in contempt of court or face other sanctions. That means that you may have to serve time in jail, pay a fine, or face other punishment for that violation.

I will now tell you the law that you must follow to reach your verdict. You must follow the law exactly as I give it to you, even if you disagree with it. If the attorneys say or have said anything

different about what the law means, you must follow what I say.

In reaching your verdict, do not guess what I think your verdict should be from something I may have said or done.

Pay careful attention to all the instructions that I give you. All the instructions are important because together they state the law that you will use in this case. You must consider all of the instructions together.

After you have decided what the facts are, you may find that some instructions do not apply. In that case, follow the instructions that do apply and use them together with the facts to reach your verdict.

If I repeat any ideas or rules of law during my instructions, that does not mean that these ideas or rules are more important than the others. In addition, the order in which the instructions are given does not make any difference.

CACI 101

KGM or Kaley G.M. is the person bringing this lawsuit. She is called the Plaintiff. As I previously told you, Kaley G.M.'s full name is not being disclosed publicly because she was a minor at the time of the events in question. Minors have extra privacy protections in court. The court has ordered that her full name will be removed from all documents before they are shown to you. This does not otherwise affect the evidence that will be presented at trial.

KGM seeks damages from two companies, who are called defendants. In this trial, the two defendants will be referred to as Meta and YouTube. Sometimes I will refer to them together as defendants.

Meta as used in these instructions refers to Meta Platforms, Inc. and Instagram, LLC.

YouTube as used in these instructions refers to YouTube, LLC and Google, LLC.

CACI 5002

You must decide what the facts are in this case only from the evidence you have seen or heard during the trial, including any exhibits that I admit into evidence. Sworn testimony,

documents, or anything else may be admitted into evidence. You may not consider as evidence anything that you saw or heard when court was not in session, even something done or said by one of the parties, attorneys, or witnesses.

What the attorneys say during the trial is not evidence. In their opening statements and closing arguments, the attorneys talk to you about the law and the evidence. What the lawyers say may help you understand the law and the evidence, but their statements and arguments are not evidence.

The attorneys' questions are not evidence. Only the witnesses' answers are evidence. You should not think that something is true just because an attorney's question suggested that it was true.

Each side had the right to object to evidence offered by the other side. If I sustained an objection to a question, ignore the question and do not guess as to why I sustained the objection. If the witness did not answer, you must not guess what he or she might have said. If the witness already answered, you must ignore the answer.

During the trial I granted a motion to strike testimony that you heard. You must totally disregard that testimony. You must treat it as though it did not exist.

CACI 116

I know that many of us are used to communicating and perhaps even learning by electronic communications and research. However, there are good reasons why you must not electronically communicate or do any research on anything having to do with this trial or the parties.

In court, jurors must make important decisions that have consequences for the parties. Those decisions must be based only on the evidence that you hear in this courtroom.

The evidence that is presented in court can be tested; it can be shown to be right or wrong by either side; it can be questioned; and it can be contradicted by other evidence. What you might read or hear on your own could easily be wrong, out of date, or inapplicable to this case.

The parties can receive a fair trial only if the facts and information on which you base your decisions are presented to you as a group, with each juror having the same opportunity to see, hear,

and evaluate the evidence.

Also, a trial is a public process that depends on disclosure in the courtroom of facts and evidence. Using information gathered in secret by one or more jurors undermines the public process and violates the rights of the parties.

CACI 5003

A witness is a person who has knowledge related to this case. You will have to decide whether you believe each witness and how important each witness's testimony is to the case. You may believe all, part, or none of a witness's testimony.

In deciding whether to believe a witness's testimony, you may consider, among other factors, the following:

a. How well did the witness see, hear, or otherwise sense what the witness described in court?

b. How well did the witness remember and describe what happened?

c. How did the witness look, act, and speak while testifying?

d. Did the witness have any reason to say something that was not true? For example, did the witness show any bias or prejudice or have a personal relationship with any of the parties involved in the case or have a personal stake in how this case is decided?

e. What was the witness's attitude toward this case or about giving testimony?

Sometimes a witness may say something that is not consistent with something else the witness said. Sometimes different witnesses will give different versions of what happened. People often forget things or make mistakes in what they remember. Also, two people may see the same event but remember it differently. You may consider these differences, but do not decide that testimony is untrue just because it differs from other testimony.

However, if you decide that a witness did not tell the truth about something important, you may choose not to believe anything that witness said. On the other hand, if you think the witness did not tell the truth about some things but told the truth about others, you may accept the part you think

is true and ignore the rest.

Do not make any decision simply because there were more witnesses on one side than on the other. If you believe it is true, the testimony of a single witness is enough to prove a fact.

You must not be biased in favor of or against any witness because of the witness's disability, gender, race, religion, ethnicity, sexual orientation, age, national origin, or socioeconomic status.

CACI 5005

There are multiple defendants in this trial. You should decide the case against each defendant separately as if it were a separate lawsuit. Each defendant is entitled to separate consideration of each defendant's own defenses.

Unless I tell you otherwise, all instructions apply to the plaintiff and each defendant.

CACI 5006

Defendants Meta and YouTube are corporations and parties in this lawsuit. Meta and YouTube are entitled to the same fair and impartial treatment that you would give to an individual. You must decide this case with the same fairness that you would use if you were deciding the case between individuals.

When I use words like "person" or "he" or "she" in these instructions to refer to a party, those instructions also apply to Meta and YouTube.

CACI 117

In reaching a verdict in this part of the case, you may not consider the wealth or poverty of any party. The parties' wealth or poverty is not relevant to any of the issues that you must decide.

CACI 200

The parties must persuade you, by the evidence presented in court, that what they are required to prove is more likely to be true than not true. This is referred to as "the burden of proof."

After weighing all of the evidence, if you cannot decide that something is more likely to be

true than not true, you must conclude that the party did not prove it. You should consider all the evidence, no matter which party produced the evidence.

In criminal trials, the prosecution must prove that the defendant is guilty beyond a reasonable doubt. But in civil trials, such as this one, the party who is required to prove something need prove only that it is more likely to be true than not true.

CACI 201

Certain facts must be proved by clear and convincing evidence, which is a higher burden of proof. This means the party must persuade you that it is highly probable that the fact is true. I will tell you specifically which facts must be proved by clear and convincing evidence.

CACI 202

Evidence can come in many forms. It can be testimony about what someone saw or heard or smelled. It can be an exhibit admitted into evidence. It can be someone's opinion.

Direct evidence can prove a fact by itself. For example, if a witness testifies she saw a jet plane flying across the sky, that testimony is direct evidence that a plane flew across the sky. Some evidence proves a fact indirectly. For example, a witness testifies that he saw only the white trail that jet planes often leave. This indirect evidence is sometimes referred to as "circumstantial evidence." In either instance, the witness's testimony is evidence that a jet plane flew across the sky.

As far as the law is concerned, it makes no difference whether evidence is direct or indirect. You may choose to believe or disbelieve either kind. Whether it is direct or indirect, you should give every piece of evidence whatever weight you think it deserves.

CACI 203

You may consider the ability of each party to provide evidence. If a party provided weaker evidence when it could have provided stronger evidence, you may distrust the weaker evidence.

CACI 205

If a party failed to explain or deny evidence against that party when the party could reasonably be expected to have done so based on what that party knew, you may consider a party's failure to explain or deny in evaluating that evidence.

It is up to you to decide the meaning and importance of the failure to explain or deny evidence against the party.

CACI 206

During the trial, certain evidence was admitted for a limited purpose. You may consider that evidence only for that purpose and for no other.

CACI 207

During the trial, I explained that certain evidence could be considered as to only one party. You may not consider that evidence as to any other party.

During the trial, I explained that certain evidence could be considered as to one or more parties but not to every party. You may not consider that evidence as to any other party.

CACI 208

During the trial, you received deposition testimony that was read from the deposition transcript and shown by video. A deposition is the testimony of a person taken before trial. At a deposition the person is sworn to tell the truth and is questioned by the attorneys. You must consider the deposition testimony that was presented to you in the same way as you consider testimony given in court.

CACI 209

Before trial, each party has the right to ask the other parties to answer written questions. These questions are called interrogatories. The answers are also in writing and are given under oath. You must consider the questions and answers that were read to you the same as if the questions and

answers had been given in court.

CACI 212

A party may offer into evidence any oral or written statement made by an opposing party outside the courtroom.

When you evaluate evidence of such a statement, you must consider these questions:

1. Do you believe that the party actually made the statement? If you do not believe that the party made the statement, you may not consider the statement at all.
2. If you believe that the statement was made, do you believe it was reported accurately?

You should view testimony about an oral statement made by a party outside the courtroom with caution.

CACI 219

During the trial you heard testimony from expert witnesses. The law allows an expert to state opinions about matters in the expert's field of expertise even if the expert has not witnessed any of the events involved in the trial.

You do not have to accept an expert's opinion. As with any other witness, it is up to you to decide whether you believe the expert's testimony and choose to use it as a basis for your decision. You may believe all, part, or none of an expert's testimony. In deciding whether to believe an expert's testimony, you should consider:

a. The expert's training and experience;

b. The facts the expert relied on; and

c. The reasons for the expert's opinion.

CACI 220

The law allows expert witnesses to be asked questions that are based on assumed facts. These are sometimes called "hypothetical questions."

In determining the weight to give to the expert's opinion that is based on the assumed facts,

you should consider whether the assumed facts are true.

CACI 221

If the expert witnesses disagreed with one another, you should weigh each opinion against the others. You should examine the reasons given for each opinion and the facts or other matters that each witness relied on. You may also compare the experts' qualifications.

CACI 223

A witness who was not testifying as an expert gave an opinion during the trial. You may, but are not required to, accept that opinion. You may give the opinion whatever weight you think is appropriate.

Consider the extent of the witness's opportunity to perceive the matters on which the opinion is based, the reasons the witness gave for the opinion, and the facts or information on which the witness relied in forming that opinion. You must decide whether information on which the witness relied was true and accurate. You may disregard all or any part of an opinion that you find unbelievable, unreasonable, or unsupported by the evidence.

Special Instruction A.

During the trial, certain documents were admitted into evidence that are redacted. "Redacted" means that a portion of the document has been blacked out. You should not draw any inferences for or against any party because a document has been redacted and should not speculate as to what was redacted.

Special Instruction B.

The Defendants in this case, Meta and YouTube, are considered to be providers of interactive computer services. The law provides certain protections for the Defendants when they make decisions about what third-party content to put on their platforms and about what third-party content to remove from their platforms. "Third-party content" means words,

pictures, video, audio, or any other form of communication that is not spoken by, created by or developed by a Defendant.

You may not hold a Defendant liable for any of the following:

a. Allowing any third-party content to appear on its platform;

b. Failing to remove any third-party content from its platform;

c. Recommending any third-party content to the Plaintiff;

d. Allowing third-party content to be private or to disappear after a period of time; or

e. Failing to warn users about the potential risks of third-party content on its platform.

A Defendant may be held liable for harm caused by a feature or activity that was part of the design or operation of a Defendant's platform, and that was not one of the protected activities listed in the previous paragraph, if you find that (1) the Defendant was negligent in designing or operating the platform, and (2) the design or operation of the platform was a substantial factor in causing KGM's harm.

"Bullying" words communicated on a platform are third-party content. As I already have instructed you during trial, you may consider evidence that KGM experienced bullying on social media only for the limited purpose of supporting Plaintiff's argument that KGM continued to use social media despite the bullying messages she received.

CACI 400

KGM claims that she was harmed by one or more Defendants' negligence. To establish this claim, KGM must prove all of the following:

1. That a Defendant was negligent in designing or operating its platform;
2. That KGM was harmed; and
3. That the Defendant's negligence was a substantial factor in causing KGM's harm.

When I refer to "Defendants" in this instruction I mean Meta and YouTube.

CACI 401

Negligence is the failure to use reasonable care to prevent harm to oneself or to others.

A person can be negligent by acting or failing to act. A person is negligent if that person does something that a reasonably careful person would not do in the same situation or fails to do something that a reasonably careful person would do in the same situation.

You must decide how a reasonably careful person would have acted in Meta's and/or YouTube's situation.

CACI 402

Children are not held to the same standards of behavior as adults. A child is required to use the amount of care that a reasonably careful child of the same age, intelligence, knowledge, and experience would use in that same situation.

CACI 411

Every person has a right to expect that every other person will use reasonable care and will not violate the law, unless that person knows, or should know, that the other person will not use reasonable care or will violate the law.

CACI 412

An adult must anticipate the ordinary behavior of children. An adult must be more careful when dealing with children than with other adults. This instruction applies only to the time in which the plaintiff was a minor.

CACI 413

You may consider customs or practices in the industry in deciding whether Meta and YouTube acted reasonably. Customs and practices do not necessarily determine what a reasonable person would have done in Meta's and/or YouTube's situation. They are only factors for you to consider.

Following a custom or practice does not excuse conduct that is unreasonable. You should consider whether the custom or practice itself is reasonable.

CACI 430

A substantial factor in causing harm is a factor that a reasonable person would consider to have contributed to the harm. It must be more than a remote or trivial factor. It does not have to be the only cause of the harm.

Conduct is not a substantial factor in causing harm if the same harm would have occurred without that conduct.

CACI 431

A person's negligence may combine with another factor to cause harm. If you find that Meta's and/or YouTube's negligence was a substantial factor in causing KGM's harm, then Meta and/or YouTube is responsible for the harm. A Defendant cannot avoid responsibility just because some other person, condition, or event was also a substantial factor in causing KGM's harm.

CACI 1222

KGM claims that Meta and YouTube were negligent by not using reasonable care to warn about dangers to minors from the design or operation of their platforms (Instagram and YouTube) or about facts that made the design or operation of those platforms likely to be dangerous to minors.

To establish this claim, KGM must prove all of the following as to that Defendant:

1. That Defendant knew or reasonably should have known that the design or operation of its platform was dangerous or was likely to be dangerous when used by a minor in a reasonably foreseeable manner;
2. That Defendant knew or reasonably should have known that users would not realize the danger;
3. That Defendant failed to adequately warn of the danger;
4. That a reasonable platform designer or operator under the same or similar

circumstances would have warned of the danger or instructed on the safe use of the platform;

5. That KGM was harmed by the design or operation of Defendant's platform; and
6. That Defendant's failure to adequately warn or instruct was a substantial factor in causing KGM's harm.

When I refer to "Defendants" in this instruction, I mean Meta and YouTube.

CACI 3700

An employer is responsible for harm caused by the wrongful conduct of its employees while acting within the scope of their employment.

CACI 3900

If you decide that KGM has proved her claim against any Defendant, you also must decide how much money will reasonably compensate KGM for the harm. This compensation is called "damages."

The amount of damages must include an award for each item of harm that was caused by a Defendant's wrongful conduct, even if the particular harm could not have been anticipated.

KGM does not have to prove the exact amount of damages that will provide reasonable compensation for the harm. However, you must not speculate or guess in awarding damages.

CACI 3905A

KGM claims damages for past and future physical pain, mental suffering, loss of enjoyment of life, physical impairment, inconvenience, grief, anxiety, humiliation, emotional distress, self-harm, sleep deprivation or disturbance, loss of self-esteem, body dysmorphia, depression, and addiction.

No fixed standard exists for deciding the amount of these noneconomic damages. You must use your judgment to decide a reasonable amount based on the evidence and your common sense.

To recover for future physical pain, mental suffering, loss of enjoyment of life, physical

impairment, inconvenience, grief, anxiety, humiliation, emotional distress, self-harm, sleep deprivation or disturbance, loss of self-esteem, body dysmorphia, depression, or addiction, KGM must prove that she is reasonably certain to suffer that harm.

For future physical pain, mental suffering, loss of enjoyment of life, physical impairment, inconvenience, grief, anxiety, humiliation, emotional distress, self-harm, sleep deprivation or disturbance, loss of self-esteem, body dysmorphia, depression, and addiction, determine the amount in current dollars paid at the time of judgment that will compensate KGM for future physical pain, mental suffering, loss of enjoyment of life, physical impairment, inconvenience, grief, anxiety, humiliation, emotional distress, self-harm, sleep deprivation or disturbance, loss of self-esteem, body dysmorphia, depression, and addiction.

CACI 3925

The arguments of the attorneys are not evidence of damages. Your award must be based on your reasoned judgment applied to the testimony of the witnesses and the other evidence that has been admitted during trial.

CACI 3927

KGM is not entitled to damages for any physical or emotional condition that she had before Defendants' conduct occurred. However, if KGM had a physical or emotional condition that was made worse by a Defendant's wrongful conduct, you must award damages that will reasonably and fairly compensate her for the effect on that condition.

CACI 3928

You must decide the full amount of money that will reasonably and fairly compensate KGM for all damages caused by the wrongful conduct of Meta and/or YouTube, even if KGM was more susceptible to injury than a normally healthy person would have been, and even if a normally healthy person would not have suffered similar injury.

CACI 3933

In this case, KGM seeks damages from more than one defendant. You must determine the liability of each defendant to KGM separately.

If you determine that more than one defendant is liable to KGM for damages, you will be asked to find KGM's total damages and the comparative fault of each defendant.

In deciding on the amount of damages, consider only KGM's claimed losses. Do not attempt to divide the damages among the defendants. The allocation of responsibility for payment of damages among multiple defendants is to be done by the court after you reach your verdict.

CACI 3946

If you decide that Meta's and/or YouTube's conduct caused KGM harm, you must decide whether that conduct justifies an award of punitive damages. The amount, if any, of punitive damages will be an issue decided later.

At this time, you must decide whether KGM has proved that Meta and/or YouTube engaged in that conduct with malice, oppression, or fraud. To do this, KGM must prove one of the following by clear and convincing evidence:

1. That the conduct constituting malice, oppression, or fraud was committed by one or more officers, directors, or managing agents of Meta and/or YouTube who acted on behalf of Meta and/or YouTube; or
2. That the conduct constituting malice, oppression, or fraud was authorized by one or more officers, directors, or managing agents of Meta and/or YouTube; or
3. That one or more officers, directors, or managing agents of Meta and/or YouTube knew of the conduct constituting malice, oppression, or fraud and adopted or approved that conduct after it occurred.

"Malice" means that Meta and/or YouTube acted with intent to cause injury or that Meta's and/or YouTube's conduct was despicable and was done with a willful and knowing disregard of the rights or safety of another. A defendant acts with knowing disregard when the defendant is aware of the probable dangerous consequences of the defendant's conduct and deliberately fails to avoid

those consequences.

"Oppression" means that Meta's and/or YouTube's conduct was despicable and subjected KGM to cruel and unjust hardship in knowing disregard of her rights.

"Despicable conduct" is conduct that is so vile, base, or contemptible that it would be looked down on and despised by reasonable people.

"Fraud" means that a Defendant intentionally misrepresented or concealed a material fact and did so intending to harm KGM.

CACI 3964

You must not consider, or include as part of any award, attorney fees or expenses that the parties incurred in bringing or defending this lawsuit.

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CACI 5009

When you go to the jury room, the first thing you should do is choose a presiding juror. The presiding juror should see to it that your discussions are orderly and that everyone has a fair chance to be heard.

It is your duty to talk with one another in the jury room and to consider the views of all the jurors. Each of you must decide the case for yourself, but only after you have considered the evidence with the other members of the jury. Feel free to change your mind if you are convinced that your position should be different. You should all try to agree. But do not give up your honest beliefs just because the others think differently.

Please do not state your opinions too strongly at the beginning of your deliberations or immediately announce how you plan to vote as it may interfere with an open discussion. Keep an open mind so that you and your fellow jurors can easily share ideas about the case.

You should use your common sense and experience in deciding whether testimony is true and accurate. However, during your deliberations, do not make any statements or provide any information to other jurors based on any special training or unique personal experiences that you may have had related to matters involved in this case. What you may know or have learned through

your training or experience is not a part of the evidence received in this case.

Sometimes jurors disagree or have questions about the evidence or about what the witnesses said in their testimony. If that happens, you may ask to have testimony read back to you or ask to see any exhibits admitted into evidence that have not already been provided to you. Also, jurors may need further explanation about the laws that apply to the case. If this happens during your discussions, write down your questions and give them to court staff. I will talk with the attorneys before I answer so it may take some time. You should continue your deliberations while you wait for my answer. I will do my best to answer them. When you write me a note, do not tell me how you voted on an issue unless I ask for this information in open court.

Your decision must be based on your personal evaluation of the evidence presented in the case. Each of you may be asked in open court how you voted on each question.

While I know you would not do this, I am required to advise you that you must not base your decision on chance, such as a flip of a coin. If you decide to award damages, you may not agree in advance to simply add up the amounts each juror thinks is right and then, without further deliberations, make the average your verdict.

You may take breaks, but do not discuss this case with anyone, including each other, until all of you are back in the jury room.

CACI 5030

In your role as a juror, you must not let bias influence your assessment of the evidence or your decisions.

I will now provide some information about how bias might affect decision-making. Our brains help us navigate and respond quickly to events by grouping and categorizing people, places, and things. We all do this. These mental shortcuts are helpful in some situations, but in the courtroom they may lead to biased decision-making.

Bias can affect what we notice and pay attention to, what we see and hear, what we remember, how we perceive people, and how we make decisions. We may favor or be more likely to believe people whom we see as similar to us or with whom we identify. Conversely, we may

disfavor or be less likely to believe people whom we see as different from us.

Although we are aware of some of our biases, we may not be aware of all of them. We refer to biases that we are not aware of as "implicit" or "unconscious." They may be based on stereotypes we would reject if they were brought to our attention. Implicit or unconscious biases can affect how we perceive others and how we make decisions, without our being aware of the effect of these biases on those decisions.

To ensure that bias does not affect your decisions in this case, consider the following steps:

1. Reflect carefully and thoughtfully about the evidence. Think about why you are making each decision and examine it for bias. Resist the urge to jump to conclusions or to make judgments based on personal likes or dislikes, generalizations, prejudices, stereotypes, or biases.
2. Consider your initial impressions of the people and the evidence in this case. Would your impressions be different if any of the people were, for example, of a different age, gender, race, religion, sexual orientation, ethnicity, or national origin? Was your opinion affected because a person has a disability or speaks in a language other than English or with an accent? Think about the people involved in this case as individuals. Focusing on individuals can help reduce the effect of biases or stereotypes on decision-making.
3. Listen to the other jurors. Their backgrounds, experiences, and insights may be different from yours. Hearing and sharing different perspectives may help identify and eliminate biased conclusions.

The law demands that jurors make unbiased decisions, and these strategies can help you fulfill this important responsibility. You must base your decisions solely on the evidence presented, your evaluation of that evidence, your common sense and experience, and these instructions.

CACI 5010

If you have taken notes during the trial, you may take your notebooks with you into the jury room.

You may use your notes only to help you remember what happened during the trial. Your independent recollection of the evidence should govern your verdict. You should not allow yourself to be influenced by the notes of other jurors if those notes differ from what you remember.

At the end of the trial, your notes will be collected and destroyed.

CACI 5011

You may request in writing that trial testimony be read to you. I will have the court reporter read the testimony to you. You may request that all or a part of a witness's testimony be read.

Your request should be as specific as possible. It will be helpful if you can state:

1. The name of the witness;
2. The subject of the testimony you would like to have read; and
3. The name of the attorney or attorneys asking the questions when the testimony was given.

The court reporter is not permitted to talk with you when she or he is reading the testimony you have requested.

While the court reporter is reading the testimony, you may not deliberate or discuss the case.

You may not ask the court reporter to read testimony that was not specifically mentioned in a written request. If your notes differ from the testimony, you must accept the court reporter's record as accurate.

CACI 5012

I will give you verdict forms with questions you must answer. I have already instructed you on the law that you are to use in answering these questions. You must follow my instructions and the forms carefully. You must consider each question separately. Although you may discuss the evidence and the issues to be decided in any order, you must answer the questions on the verdict forms in the order they appear. After you answer a question, the form tells you what to do next.

At least 9 of you must agree on an answer before you can move on to the next question. However, the same 9 or more people do not have to agree on each answer.

evidence in the case. Some of these materials have been admitted into evidence, and you will be able to review them during your deliberations.

Other materials have also been shown to you during the trial, but they have not been admitted into evidence. You will not be able to review them during your deliberations because they are not themselves evidence or proof of any facts. You may, however, consider the testimony given in connection with those materials.

FILED
Superior Court of California
County of Los Angeles
03/25/2026
David W. Slayton, Executive Officer / Clerk of Court
By: A. Rosas Deputy

P.F., et al. (KGM) v. Meta Platforms, et al.

VERDICT FORM – YouTube

WE ANSWER THE QUESTIONS SUBMITTED TO US AS FOLLOWS:

1. Was YouTube negligent in the design or operation of YouTube?

Yes ✓ No _____

If your answer to Question 1 is yes, then answer Question 2. If you answered no, proceed to Question 3.

2. Was YouTube's negligence a substantial factor in causing harm to K.G.M.?

Yes ✓ No _____

Proceed to Question 3.

3. Did YouTube know or should it reasonably have known that the design or operation of YouTube was dangerous or was likely to be dangerous when used by a minor in a reasonably foreseeable manner?

Yes ✓ No _____

If your answer to Question 3 is yes, then answer Question 4. If your answer to Question 3 is no, do not answer Questions 4-7 and have the presiding juror sign and date this verdict form.

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4. Did YouTube know or should it reasonably have known that users would not realize the danger?

Yes ✓ No _____

If your answer to Question 4 is yes, then answer Question 5. If your answer to Question 4 is no, do not answer Questions 5-7 and have the presiding juror sign and date this verdict form.

5. Did YouTube fail to adequately warn of the danger?

Yes ✓ No _____

If your answer to Question 5 is yes, then answer Question 6. If your answer to Question 5 is no, do not answer Questions 6-7 and have the presiding juror sign and date this verdict form.

6. Would a reasonable platform designer or operator under the same or similar circumstances have warned of the danger or instructed on the safe use of the platform?

Yes ✓ No _____

If your answer to Question 6 is yes, then answer Question 7. If your answer to Question 6 is no, do not answer Question 7 and have the presiding juror sign and date this verdict form.

7. Was YouTube's failure to adequately warn or instruct a substantial factor in causing harm to K.G.M.?

Yes ✓ No _____

Signed: [redacted]

Dated: 03/25/26

FILED
Superior Court of California
County of Los Angeles
03/25/2026
David W. Slayton, Executive Officer / Clerk of Court
By: A. Rosas Deputy

P.F., et al. (KGM) v. Meta Platforms, et al.

VERDICT FORM – COMPENSATORY DAMAGES AND CLAIM OF PUNITIVE CONDUCT

Answer the questions on this verdict form if you answered "yes" to Question 2 or Question 7 on the Verdict Form for Meta or on the Verdict Form for YouTube

WE ANSWER THE QUESTIONS SUBMITTED TO US AS FOLLOWS:

A. What are K.G.M.'s damages?

$3,000,000

If your answer to Question A was more than $0, answer the remaining Questions. Otherwise stop here, answer no further questions and have the presiding juror sign and date this form.

B. What percentage of responsibility for K.G.M.'s harm do you assign to each of the following? *Insert percentages for a Defendant only if you answered "Yes" to either Question 2 or Question 7 on that Defendant's Verdict Form.*

(The total must add up to 100%)

Meta: 70 %

YouTube 30 %

TOTAL: 100%

Original

*If you answered "Yes" to either Question 2 or Question 7 on **Meta's** verdict form, answer Question C. Otherwise proceed to Question D below.*

C. Do you find that K.G.M. proved by clear and convincing evidence that Meta acted with malice, oppression, or fraud in conduct upon which you base your finding of liability?

Yes ✓ No _____

*If you answered "Yes" to either Question 2 or Question 7 on **YouTube's** verdict form, answer Question D. Otherwise have the Presiding Juror sign and date this Verdict Form.*

D. Do you find that K.G.M. proved by clear and convincing evidence that YouTube acted with malice, oppression, or fraud in conduct upon which you base your finding of liability?

Yes ✓ No _____

Signed: [redacted]

Dated: 03/25/26

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VERDICT FORM – PUNITIVE DAMAGES

We, the jury in the above-entitled action, answer the following questions submitted to us as follows:

1. What amount of punitive damages, if any, do you award Plaintiff K.G.M.?

A. Meta $2,100,000

B. YouTube $900,000

Signed: [redacted]

Dated: 3-25-26

Original